

**PUBLIC DISCLOSURE**

**JULY 23, 2012**

**COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**HARVARD UNIVERSITY EMPLOYEES CREDIT UNION  
67696**

**16 DUNSTER STREET  
CAMBRIDGE, MASSACHUSETTS 02138**

**DIVISION OF BANKS  
1000 WASHINGTON ST, 10<sup>TH</sup> FLOOR  
BOSTON, MA 02118**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

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## GENERAL INFORMATION

The Community Reinvestment Act (“CRA”) requires the Massachusetts Division of Banks (“Division”) to use its authority when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the needs of its entire assessment area, including low- and moderate-income individuals, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its assessment area.

This document is an evaluation of the CRA performance of Harvard University Employees Credit Union (the “Credit Union”), prepared by the Division, the institution’s supervisory agency as of July 23, 2012. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

**INSTITUTION’S CRA RATING: This institution is rated Satisfactory.**

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Satisfactory.**

An institution in this group has an adequate record of meeting the credit needs of its membership, including low- and moderate-income members, in a manner consistent with its resources and capabilities.

The Credit Union’s performance was evaluated utilizing the Federal Financial Institutions Examination Council (“FFIEC”) Intermediate Small Institution (“ISI”) procedures. The assigned rating is based on the result of two performance tests: the Lending Test and the Community Development Test. The Credit Union achieved a Satisfactory rating for both the Lending Test and the Community Development Test.

According to CRA regulations, an institution shall delineate one or more assessment areas within which the institution will serve to meet the credit needs and by which the Division will evaluate the institution’s CRA performance. Credit unions whose membership by-law provisions are not based upon geographic boundaries are permitted to designate its membership as its assessment area.

Since the Credit Union has defined its membership as its assessment area as opposed to a geographic area, an evaluation of credit extended within defined geographic areas was not conducted as such analysis would not be meaningful. Therefore, the Lending Test was based upon an analysis of the Credit Union’s performance in providing loans to its members, including low- and moderate-income members. A summary of the Credit Union’s performance is provided below:

### Lending Test

- The Credit Union’s loan-to-share ratio for the previous 13 quarters was determined to be 78.3 percent and is considered reasonable.
- Overall, the Credit Union’s home mortgage lending to low- and moderate-income members is reasonable. In 2010, the Credit Union originated 2.8 percent of home mortgage loans to low-income borrowers and 13.8 percent to moderate-income borrowers. In 2011, the Credit

Union originated 3.1 percent to low-income borrowers and 12.2 percent to moderate-income borrowers.

- There were no CRA-related complaints received during the evaluation period.

#### Community Development Test

The Credit Union's community development performance demonstrates a satisfactory responsiveness to the community development needs of its membership through services, community development lending, and qualified investments.

## **SCOPE OF EXAMINATION**

Harvard University Employees Credit Union was evaluated according to ISI CRA Examination Procedures, which apply to an institution with assets of at least \$290 million as of December 31 of both of the prior two calendar years, and less than \$1.16 billion as of December 31 of either of the prior two calendar years, adjusted annually.

This evaluation considered the Credit Union's lending for the period of January 1, 2010 through December 31, 2011 and its community development activities from September 9, 2008 to July 23, 2012. The data and applicable timeframes used for the Lending Test are discussed below.

The evaluation considered the Credit Union's home mortgage loans originated in 2010 and 2011. Under the CRA, a home mortgage loan is considered to be a home purchase, home improvement, or refinancing of a dwelling-secured loan. Home mortgage loans were reported pursuant to the Home Mortgage Disclosure Act ("HMDA"). Data was obtained from the Loan Application Register ("LAR"). Based on the Credit Union's loan portfolio composition as of June 30, 2012, the primary lending activity consists of first mortgage real estate/lines of credit, which accounted for 64.7 percent of the Credit Union's loan portfolio.

As of June 30, 2012, consumer loans accounted for 31.2 percent of the Credit Union's loan portfolio. Of all consumer loans, non-federally guaranteed student loans accounted for \$43.1 million, or 53.2 percent. As previously mentioned, because the Credit Union defined its assessment area as its membership, meaningful lending analysis can only be derived from borrower income as opposed to a geographic analysis of lending. Borrower income was not recorded by the Credit Union for its student loans; therefore, the inclusion of student loans as a subset of consumer loans would not yield a meaningful analysis. Excluding student loans, consumer loans accounted for only 14.6 percent of the Credit Union's loan portfolio, which was determined to be relatively insignificant.

## **PERFORMANCE CONTEXT**

### **Description of Institution**

Harvard University Employees Credit Union was chartered by the Commonwealth of Massachusetts in 1939. Established to promote thrift among employees of Harvard University, the Credit Union expanded its membership to include persons employed by Harvard University, Harvard teaching hospitals, and affiliated organizations, their immediate families, students and alumni of Harvard University, as well as students, alumni, employees and retired employees of Lesley University and affiliates of Lesley University and their immediate family members.

The Credit Union's main office is located at 16 Dunster Street, Cambridge, Massachusetts, a middle-income census tract. The Credit Union operates three additional branch offices: 55 Fruit Street, Boston; 149 13<sup>th</sup> Street, Charlestown; and 677 Huntington Avenue, Boston. The Charlestown and Huntington Avenue branches are located in low-income tracts and the Fruit Street branch is located in an upper-income census tract. The Charlestown branch was opened in June 2011.

As of June 30, 2012, the Credit Union's assets totaled \$408.4 million. The Credit Union's loan portfolio as of this date totaled \$260.5 million, 63.8 percent of the Credit Union's total assets. The largest portion of the loan portfolio is comprised of first mortgage real estate loans (64.7 percent) followed by non-federally guaranteed student loans (16.6 percent). Please refer to the following table for further information regarding the composition of the Credit Union's loan portfolio.

<b>Table 1 - Loan Portfolio as of June 30, 2012</b>		
<b>Loan Type</b>	<b>Dollar Amount \$(000s)</b>	<b>Percent of Total Loans (%)</b>
First Mortgage Real Estate Loans/Lines of Credit	168,538	64.7
Non-Federally Guaranteed Student Loans	43,127	16.6
Unsecured Credit Card Loans	12,061	4.6
Other Real Estate Loans/Lines of Credit	10,725	4.1
Used Vehicle Loans	10,262	3.9
All Other Unsecured Loans/Lines of Credit	7,041	2.7
Total All Other Loans/Lines of Credit	5,152	2.0
New Vehicle Loans	3,582	1.4
Less – ALLL	(1,691)	-
<b>Total</b>	<b>\$260,489</b>	<b>100.0</b>

*Source: 6/30/12 Consolidated Report of Condition.*

The Credit Union's product offerings include checking and savings accounts, certificates of deposit, IRAs, money market accounts, auto, home, personal, and student loans, as well as credit cards. Online and mobile banking are also offered.

The Division last examined the Credit Union for compliance with the CRA on September 8, 2008. That examination resulted in a CRA rating of "Satisfactory."

There are no apparent financial or legal impediments that would limit the Credit Union's ability to help meet the credit needs of its members.

**Description of Assessment Area**

In accordance with 209 CMR 46.41, the Credit Union defines its membership as its assessment area. According to the Credit Union's by-laws, membership is limited to employees, students and alumni of Harvard University, Harvard teaching hospitals and affiliated organizations, as well as Lesley University students, alumni, faculty and staff. For individuals falling into the Credit Union's scope of membership, a family member can also qualify. As of June 30, 2012, the Credit Union has 31,586 members.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The Lending Test considers the Credit Union's performance pursuant to the following criteria: Loan to Share ("LTS") ratio; lending to borrowers of different incomes; and the Credit Union's record of taking action in response to CRA complaints. Overall, the Credit Union's performance under the Lending Test is considered "Satisfactory." Harvard University Employees Credit Union's lending performance demonstrates reasonable responsiveness to the credit needs of its membership.

### **LOAN-TO-SHARE (LTS) ANALYSIS**

This performance criterion determines what percentage of the Credit Union's deposit base is reinvested in the form of loans and evaluates its appropriateness. The Credit Union's loan-to-share ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.

The Credit Union's LTS ratio as of June 30, 2012 was 71.6 percent. The Credit Union's average quarterly net LTS ratio was 78.3 percent and was calculated by averaging the previous 13 quarterly net LTS ratios between June 30, 2009 and June 30, 2012. During the review period, the LTS ratio reached a high of 82.5 percent in June 2009 and a low of 71.6 percent in June 2012.

Fluctuations in the loan portfolio and share-deposits were analyzed. From June 2009 to June 2012, the Credit Union experienced a steady increase in share-deposits resulting in an overall increase of 41.4 percent. Credit Union management attributed the large increase in share-deposits as a result of a tightening of credit standards, members investing less money in the financial markets due to a weakening economy, and the success of promoting the Credit Union as a better alternative to larger financial institutions.

From June 2009 to December 2010, the loan volume steadily increased and then remained relatively level through June 2012. Overall, during the previous 13 quarters, the Credit Union's lending has increased by 22.9 percent. During the previous 13 quarters, both loans and share-deposits increased, but the increase in shares outpaced the increase in loans, causing the LTS ratio to decrease.

For evaluation purposes, the Credit Union's LTS ratio was compared to a group of similarly situated financial institutions by asset size and location.

<b>Table 2 - Net Loan-to-Share Ratios</b>		
<b>Institution</b>	<b>LTS Ratio (%)</b>	<b>Asset Size \$(000s)</b>
Massachusetts Institute of Technology Federal Credit Union	73.9	335,575
<i>Harvard University Employees Credit Union</i>	73.2	399,659
UMASS Five College Federal Credit Union	69.4	361,834

*Source: Statement of Financial Condition of 3/31/2012*



As illustrated in the Table 2, as of March 31, 2012, Harvard University Employees Credit Union had a loan-to-share ratio of 73.2 percent which was consistent with its peer group.

### **DISTRIBUTION OF CREDIT AMONG BORROWERS OF DIFFERENT INCOME LEVELS**

The following analysis of borrower income distribution demonstrates that the Credit Union's lending meets the standards for satisfactory performance.

An analysis of home mortgage loans extended to Credit Union members was conducted to determine the distribution of lending by borrower income level. The following table illustrates the originated home mortgage loan distribution by borrower income for 2010 and 2011.

<b>Table 3 - Distribution of HMDA Loans by Borrower Income</b>						
<b>Median Family Income Level</b>	<b>2010</b>		<b>2011</b>		<b>Total</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Low</b>	9	2.8	9	3.1	22	3.5
<b>Moderate</b>	45	13.8	36	12.2	77	12.4
<b>Middle</b>	54	16.6	69	23.5	123	19.8
<b>Upper</b>	218	66.9	180	61.2	398	64.2
<b>Total</b>	<b>326</b>	<b>100.0</b>	<b>294</b>	<b>100.0</b>	<b>620</b>	<b>100.0</b>

*Source: HMDA LAR for 2010 and 2011.*

As outlined in the table above, 2.8 percent of home mortgage loans were originated to low-income members and 13.8 percent were made to moderate-income members in 2010. In 2011, 3.1 percent of home mortgage loans were made to low-income members and 12.2 percent were made to moderate-income members.

The Credit Union's distribution of lending by borrower income level reflects reasonable dispersion and willingness and ability to provide mortgage loan products accessible to all income levels.

### **RESPONSE TO CRA COMPLAINTS**

The Credit Union has not received any CRA-related complaints during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

Community development activities considered for the Community Development Test include:

- (1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
- (2) Community services targeted to low-or moderate-income individuals;
- (3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company Programs (13 CRF 121.301) or have gross annual revenues of \$1 million or less; or
- (4) Activities that revitalize or stabilize low-or moderate-income geographies.
- (5) Loans, investments, and services that support, enable, or facilitate Neighborhood Stabilization Program (NSP) eligible activities in designated target areas.

The Credit Union has a satisfactory record of meeting the community development needs of its members through its services, loans, and qualified investments.

### *Community Development Services*

A community development service has community development as its primary purpose and is generally related to the provision of technical service.

The President/CEO the EVP of Retail Services of the Credit Union are board members of the Cambridge Housing Assistance Fund (CHAF). CHAF provides a bridge to housing for homeless and near homeless families and individuals by assisting with the initial costs of renting an apartment and providing one time assistance grants to families at risk of becoming homeless.

### Educational Seminars and Programs

The Credit Union was involved in numerous financial education seminars from July 2011 to June 2012. Nearly all of the seminars were held in conjunction with Harvard University with the goal of educating students. Programs included budgeting and managing credit for entering law and medical students; identity theft education for incoming freshmen; the psychology of money; and credit 101 and investments 101 seminars were held at numerous schools within Harvard University, as well as seminars on managing credit, budgeting and housing strategies for seniors.

In 2011, a loan originator conducted 13 first-time homebuyer seminars at Credit Union branches and other locations. Topics included credit reports, preapprovals, lender qualifying guidelines, and a timeline of the home buying process. For year-to-date 2012, the same loan originator has conducted 9 seminars, many in conjunction with Harvard University and a real estate agency. Topics included preapproval, Good Faith Estimates (GFE), changes in the mortgage industry, and important decisions that have to be made in the home buying process. Attendees were primarily employees of various Harvard affiliated organizations.

## ***Community Development Loans***

The Credit Union's community development lending activities are evaluated pursuant to the following criteria: (1) the extent to which community development lending opportunities have been made available to the Credit Union; (2) the responsiveness of the Credit Union's community development lending; and (3) the extent of leadership the Credit Union has demonstrated in community development lending. As defined by CRA regulation, a community development loan is defined as a loan that (1) has community development as its primary purpose; (2) has not already been reported by the Credit Union for consideration under small business or home mortgage lending (unless it is a multifamily dwelling loan); and (3) benefits the Credit Union's assessment area or a broader statewide or regional area that includes the Credit Union's assessment area.

The following loan program offered by the Credit Union that falls under the scope of community development:

**Harvard Haiti Emergency Relief Fund** – The fund was established to help members of the Harvard University staff and faculty who have lost loved ones or otherwise suffered personally as a result of the January 12, 2010 earthquake. Funds helped pay for food, housing, travel, medical, or other personal expenses for themselves or dependent family members in Haiti. The University took applications and the Credit Union provided zero percent loans. In all, 52 loans were originated with a total funding of \$94,063.

## ***Community Development Investments***

A qualified community development investment is a lawful investment, deposit, membership share, or grant that has community development as its primary purpose. Between September 9, 2008 and July 23, 2012, Credit Union donations totaled \$138,134 of which \$117,285 or 85 percent were CRA qualified. Donations in 2008 and 2012 represent partial year data.

Table 4 - Community Development Investment by Category										
Category	2008		2009		2010		2011		2012	
Affordable Housing	1	\$1,500	4	\$15,530	3	\$5,080	3	\$6,950	1	\$2,500
Services	1	\$250	5	\$22,500	7	\$29,350	9	\$27,825	5	\$5,800
<b>Total</b>	<b>2</b>	<b>\$1,750</b>	<b>9</b>	<b>\$38,030</b>	<b>10</b>	<b>\$34,430</b>	<b>12</b>	<b>\$34,775</b>	<b>6</b>	<b>\$8,300</b>

*Source: Credit Union donation data*

The following is a sample of organizations that received donations from the Credit Union:

**Cambridge Family & Children's Service** – The agency's mission is to identify and implement ways to strengthen family and individual self-sufficiency and promote conditions that provide all children and youth with stable homes and positive community environments.

**Food for Free Committee, Inc** – This organization rescues fresh food that might otherwise go to waste and distributes it within the local emergency food system where it can reach those in need. The Home Delivery Program brings food to low-income Cambridge residents unable to access food pantries due to illness or disability.

**Homeowner Options for Massachusetts Elders (H.O.M.E)** – The mission of this organization is to conserve and protect the equity of low- and moderate-income elder homeowners so they can “age in place.”

**Phillips Brooks House Association-** Phillips Brooks House Association (PBHA) is a student-run organization that draws upon the creative initiative of students and community members to foster collaboration that empowers individuals and communities. Approximately 1,400 volunteers participate in more than 85 programs serving 10,000 low-income people throughout Greater Boston.

## APPENDIX A

### *Fair Lending Policies and Procedures*

The Division of Banks provides comments regarding the institution's fair lending policies and procedures pursuant to Regulatory Bulletin 2.3-101.

Based upon the review of the Credit Union's public comment file and its performance relative to fair lending policies and practices, no violations of the anti-discrimination laws and regulations were identified.

The Credit Union's fair lending data was reviewed to determine how this information relates to the guidelines established by Regulatory Bulletin 2.3-101, the Division's Community Reinvestment and Fair Lending Policy. The Credit Union incorporates reference to Fair Lending as part of its loan policies. Fair lending training is administered.

A thorough review of the public comment file revealed that the Credit Union received no complaints pertaining to the institution's CRA performance since the previous examination. Sample reviews of the Credit Union's approved and non-originated residential loan application files were conducted to check for fair lending issues. No practices that would result in disparate treatment were noted.

A review of residential loan applications was conducted in order to determine the number of HMDA-reportable credit applications the Credit Union received from minority applicants. For the period reviewed, Harvard University Employees Credit Union received 168 HMDA reportable mortgage applications from racial minority members, of which 106 or 63.1 percent were originated.

<b>Table 5 - Minority Application Flow</b>								
<b>RACE</b>	2010		2010 Aggregate (MA)		2011		Credit Union Total	
	#	%	#	%	#	%	#	%
American Indian/ Alaska Native	2	0.4	659	0.1	0	0.0	2	0.2
Asian	47	10.2	21,984	4.8	31	7.0	78	8.6
Black/ African American	12	2.6	8,499	1.8	13	2.9	25	2.8
Hawaiian/Pacific Islander	0	0.0	483	0.1	2	0.5	2	0.2
2 or More Minority Races	0	0.0	103	0.0	1	0.2	1	0.1
Joint Race (White/Minority)	17	3.7	4,992	1.1	14	3.1	31	3.4
<b>Total Minority</b>	<b>78</b>	<b>16.9</b>	<b>36,720</b>	<b>8.0</b>	<b>61</b>	<b>13.7</b>	<b>139</b>	<b>15.3</b>
White	328	71.0	328,322	71.6	261	58.7	589	64.9
Race Not Available	56	12.1	93,726	20.4	123	27.6	179	19.7
<b>Total</b>	<b>462</b>	<b>100.0</b>	<b>458,768</b>	<b>100.0</b>	<b>445</b>	<b>100.0</b>	<b>907</b>	<b>100.0</b>
<b>ETHNICITY</b>								
Hispanic or Latino	7	1.5	9,696	2.1	7	1.6	14	1.5
Not Hispanic or Latino	386	83.5	350,893	76.5	307	69.0	693	76.4
Joint (Hispanic/Latino / Not Hispanic/Latino)	10	2.2	3,682	0.80	5	1.1	15	1.7
Ethnicity Not Available	59	12.8	94,497	20.6	126	28.3	185	20.4
<b>Total</b>	<b>462</b>	<b>100.0</b>	<b>458,768</b>	<b>100.0</b>	<b>445</b>	<b>100.0</b>	<b>907</b>	<b>100.0</b>

Source: 2010 and 2011 HMDA LAR, 2010 Peer Mortgage Data for Massachusetts.

The Credit Union's minority application flow for this period was compared the state of Massachusetts as determined by the 2010 aggregate data for Massachusetts. Although not exact, comparison indicates excellent performance on the part of the Credit Union with regard to this criterion.

## **APPENDIX B**

### ***General Definitions***

#### **GEOGRAPHY TERMS**

**Census Tract:** Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Metropolitan Area (MA):** One or more large population centers and adjacent communities that have a high degree of economic and social integration. Each MA must contain either a place with a minimum population of 50,000 of Census Bureau-defined urbanized area and a total MA population of at least 100,000 (75,000 in New England). An MA comprises one or more central counties and may include one or more outlying counties that have close economic and social relationships with the central county. In New England, MAs are composed of cities and towns rather than whole counties.

**Metropolitan Statistical Area (MSA):** One or more metropolitan areas that have economic and social ties.

**Non-Metropolitan Area:** All areas outside of metropolitan areas. The definition of non-metropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies; for example, there is generally both urban and rural territory within both metropolitan and non-metropolitan areas.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in: places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin) but excluding the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

#### **HOUSING TERMS**

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

## **INCOME TERMS**

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide non-metropolitan median family income, if a person or geography is located outside an MSA.

**Family Income:** Includes the income of all members of a family that are age 15 and older.

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of geography.

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of geography.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of geography.

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent in the case of geography.

**HUD Adjusted Income Data:** The U.S. Department of Housing and Urban Development (HUD) issues annual estimates which update median family income from the metropolitan and non-metropolitan areas. HUD starts with the most recent U.S. Census data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

## **OTHER TERMS**

**Home Mortgage Disclosure Loan Application Register (HMDA LAR):** The HMDA LARs record all applications received for residential purchase, refinance, home improvement and temporary-to-permanent construction loans.

**Small Farm Loan:** A loan included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.



## **PERFORMANCE EVALUATION DISCLOSURE GUIDE**

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations, require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks at 16 Dunster Street, Cambridge, MA 02138."

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agencies, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.